

1 FRANK H. COFER III, ESQ.
2 Nevada Bar No. 11362
3 **COFER & GELLER, LLC**
4 601 South Tenth Street
5 Las Vegas, Nevada 89101
6 P: (702) 777-9999
7 F: (702) 777-9995
8 *Attorney for Defendant Karapetyan*

9 UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF NEVADA

11 THE UNITED STATES OF AMERICA,

12 *Plaintiff,*

13 *vs.*

14 VAGE KARAPETYAN, *et al.*,

15 *Defendants.*

Case no. 2:16-cr-230-GMN-CWH

**DEFENDANT VAGE KARAPETYAN'S
UNOPPOSED MOTION AND [PROPOSED]
ORDER TO PERMIT DEFENDANT TO
TRAVEL TO THE STATE OF CALIFORNIA
FROM 4/12/2017 TO 4/17/2017**

16 NOW COMES Defendant VAGE KARAPETYAN, by and through FRANK H. COFER III, ESQ.
17 of COFER & GELLER, LLC, and hereby moves this Honorable Court to temporarily permit
18 Defendant to travel to the State of California during the dates of 4/12/2017 to 4/17/2017 so
19 that he can celebrate his son's thirteenth birthday. This is the defendant's third request for
20 a temporary relaxation of his terms of pretrial release.

21 This motion is unopposed by the U.S. Attorney's office and is unopposed by pretrial
22 services, and is made and based on all the papers and pleadings on file herein and the
23 declaration of counsel filed herewith.

24 RESPECTFULLY SUBMITTED this 28th day of March, 2017.

25 COFER & GELLER, LLC

26 By: /s/ Frank Cofer

27 FRANK H. COFER III, ESQ. (NV #11362)
28 *Attorney for Defendant Karapetyan*

DECLARATION OF COUNSEL

FRANK H. COFER III, ESQ., makes the following declaration:

1. I am an attorney licensed to practice law in all state courts in the State of Nevada, before the United States District Courts in the district of Nevada, and before the Ninth Circuit Court of Appeals.

2. I am retained to represent Defendant VAGE KARAPETYAN in the instant action and am making this declaration in support of DEFENDANT VAGE KARAPETYAN'S UNOPPOSED MOTION AND [PROPOSED] ORDER TO PERMIT DEFENDANT TO TRAVEL TO THE STATE OF CALIFORNIA FROM 4/12/2017 TO 4/17/2017 that is filed herewith. I have personal knowledge and am competent to testify to the matters stated herein.

3. I am informed and I believe that my client, Defendant VAGE KARAPETYAN, wishes to travel to Los Angeles, California in order to celebrate his son's thirteenth birthday with family during the dates of 4/12/2017 to 4/17/2017. However, his current conditions of release prohibit him from traveling outside of the State of Nevada.

4. I have communicated with U.S. Pretrial Services employee SAMIRA BARLOW (responsible for supervising the defendant) and AUSA ROBERT KNIEF (responsible for prosecuting this case) regarding this matter. Both of these individuals have indicated that they have no opposition to the instant motion.

5. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct except as to those matters stated herein upon information and belief.

EXECUTED on March 28th, 2017 at Las Vegas, Nevada.

COFER & GELLER, LLC

By: /s/ Frank Cofer

FRANK H. COFER III, ESQ. (NV #11362)
Attorney for Defendant Karapetyan

ORDER

THIS MATTER having come before the Court via an unopposed motion, and good cause appearing therefor,

IT IS HEREBY ORDERED that the conditions of pretrial release as to Defendant VAGE KARAPETYAN are temporarily modified in order to permit him to travel to the State of California during and throughout the following dates only: Wednesday, April 12, 2017 through Monday, April 17, 2017.

DATED this 30th day of March, 2017.

By: 

UNITED STATES ~~DISTRICT~~/ MAGISTRATE JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

I HEREBY CERTIFY that all parties to this action are registered members of the court's electronic filing system, and that on Tuesday, March 28, 2017, a true and correct copy of the foregoing document:

DEFENDANT VAGE KARAPETYAN'S UNOPPOSED MOTION AND [PROPOSED] ORDER TO PERMIT DEFENDANT TO TRAVEL TO THE STATE OF CALIFORNIA FROM 4/12/2017 TO 4/17/2017

was filed with the court's electronic filing system and that service was accomplished automatically.

By: /s/ April Burt

APRIL B. BURT

An employee of COFER & GELLER, LLC